

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



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Order Instituting Rulemaking to Consider the Adoption of
a General Order and Procedures to Implement the Digital
Infrastructure and Video Competition Act of 2006.

R.06-10-005
(Filed October 5, 2006)

**PHASE II
OPENING COMMENTS OF
AT&T CALIFORNIA**

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AT&T California, pursuant to the **Scoping Memo For Phase II And Request For Comments; Ruling On Notice Of Intent To Claim Intervenor Compensation**, dated May 7, 2007 (hereinafter, “Scoping Memo”), provides the following opening comments for Phase II of this proceeding.

I. COMMENTS ON SCOPING MEMO ISSUES

AT&T California’s comments on specific issues are presented below in the order set forth in the Scoping Memo.

A. Broadband And Video Access And Adoption Information

The Scoping Memo requests comment on whether the broadband and video access and adoption information currently being collected by the Commission is adequate.¹ The information currently being collected by the Commission is more than adequate. Additional requirements would be burdensome and go beyond the intent and scope of the Digital Infrastructure and Video Competition Act of 2006 (“DIVCA” or “the Act”).²

The first and primary finding of DIVCA is that “[i]ncreasing competition for video and broadband services is a matter of statewide concern,”³ because *increasing competition* will: (1) provide consumers with more choice, (2) lower prices, (3) speed the deployment of new communication and broadband technologies, (4) create jobs, (5) benefit the California economy, and (6) increase opportunities for programming that appeals to California’s diverse population and many cultural communities.⁴ These benefits are to be achieved by unleashing market forces,

¹ Scoping Memo, p. 5.

² AT&T Opening Comments on Proposed Decision, pp. 6-8, 10-12 (Feb. 5, 2007).

³ Pub. Util. Code § 5810(a)(1) (emphasis added). All code references are to the Public Utilities Code, unless otherwise indicated.

⁴ § 5810(a)(1)(B); § 5810(a)(1)(D).

not closely-regulating franchise holders. DIVCA went to great lengths to clarify that “video service providers *are not public utilities* or common carriers,”⁵ and that “[t]he holder of a state [video] franchise *shall not be deemed a public utility* as a result of providing video service....”⁶ DIVCA also repeatedly emphasizes that the Commission has very limited authority over video services and video service providers,

Neither the commission nor any local franchising entity or other local entity of the state may require the holder of a state franchise to obtain a separate franchise *or otherwise impose any requirement* on any holder of a state franchise *except as expressly provided in [DIVCA]*.⁷

Contrary to these clear restrictions, the Commission already imposes broadband and video reporting requirements beyond those expressly provided in DIVCA. Currently, the Commission requires reporting of (1) households by census tract,⁸ (2) low-income households by census tract,⁹ (3) households to which broadband (including wireless broadband) is made available by census tract,¹⁰ (4) broadband (including wireless broadband) subscribers by census tract,¹¹ (5) households offered video access by census tract,¹² (6) low-income households offered video access,¹³ (7) video subscribers,¹⁴ and (8) community centers served,¹⁵ among other things. Pursuant to these requirements, AT&T California already must report data for *5,652 separate census tracts*. As AT&T California has previously noted, these requirements are both broader,

⁵ § 5810(a)(3) (emphasis added).

⁶ § 5820(c) (emphasis added).

⁷ § 5840(a) (emphasis added).

⁸ D.07-03-014, Appendix B, GO 169, Section VII.C.1.(3)(a)(i).

⁹ *Id.* at Section VII.C.1.(4)(a).

¹⁰ *Id.* at Section VII.C.1.(1)(a), (2)(b).

¹¹ *Id.* at Section VII.C.1.(1)(b), (2)(c).

¹² *Id.* at Section VII.C.1.(3)(a)(ii).

¹³ *Id.* at Section VII.C.1.(4)(b).

¹⁴ *Id.* at Section VII.D.(2).

and more granular, than authorized by DIVCA;¹⁶ and require more data than needed to ensure compliance with DIVCA's limited build-out and non-discrimination requirements.¹⁷ Thus, the Commission already is collecting megabytes of reporting data more than adequate to satisfy compliance with its statutory authority.

Requiring even more data would only exacerbate the reporting burden on video franchise holders. There is no authority to do so under DIVCA. Contrary to the Scoping Memo's implication, subsection (f)(4) of section 5890 does not require franchise holders to demonstrate a "substantial and continuous" effort to meet build-out requirements. The "substantial and continuous" showing referenced in subsection (f) is only necessary where a franchise holder is seeking an *extension* to meet the requirements of section 5890.¹⁸ If and when a franchise holder seeks such an extension, the franchise holder will bear the burden of showing a "substantial and continuous" effort, but DIVCA provides no authority to require all holders to make this showing at all times.

B. Omission In Appendix B To Decision 07-03-014

The Scoping Memo also requests comments regarding any omissions in the attachments to Decision 07-03-014. AT&T California notes that Appendix B to Decision 07-03-14, General Order 169, appears to inadvertently omit the requirement that state video franchise holders provide concurrent notice to affected incumbent cable operators, as set forth at page 105 of the

¹⁵ *Id.* at Section VII.D.(1).

¹⁶ See § 5960(b); AT&T Opening Comments, pp. 8-9 (Oct. 25, 2006); AT&T Reply Comments, pp. 15-19 (Nov. 1, 2006); AT&T Opening Comments on Proposed Decision, pp. 6-8, 10-12 (Feb. 5, 2007); AT&T Reply Comments on Proposed Decision, p. 5 (Feb. 13, 2007).

¹⁷ §§ 5890(b), (e).

¹⁸ § 5890(f).

Decision. AT&T California recommends this requirement be expressly set forth in General Order 169 to avoid confusion for those parties using General Order 169 as a reference document.

C. Amendments To Commission Procedural Rules

The Scoping Memo further requests comment on any “incompatibilities” between DIVCA and the Commission’s Rules of Practice and Procedure.¹⁹ AT&T California has not identified any direct conflicts between DIVCA and the Commission’s rules. However, a number of the Commission’s rules, such as those relating to intervenor compensation,²⁰ are inapplicable to DIVCA proceedings. Accordingly AT&T California requests the Commission clarify that its determination to use the existing Rules of Practice and Procedure is not an indication that they all apply to DIVCA proceedings.

D. Renewal Of Video Franchises

AT&T California agrees with the Scoping Memo’s conclusion that renewal issues still are not ripe.²¹ As the Scoping Memo notes, the earliest date a renewal could occur is 2017. Renewal issues would be better addressed after franchise holders and other interested parties have more experience with the statewide video franchise process.

¹⁹ Scoping Memo, p. 6.

²⁰ Article 17.

²¹ Scoping Memo, p. 7.

II. CONCLUSION

For the reasons set forth above, AT&T California requests the Commission refrain from imposing additional reporting requirements, correct an omission to General Order 169, clarify that not all its Rules of Practice and Procedure apply to DIVCA proceedings, and address renewal issues at a later date.

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DATED: May 31, 2007

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the **PHASE II OPENING COMMENTS OF AT&T CALIFORNIA** in **R.06-10-005** by electronic mail, hand-delivery and/or by mailing a properly addressed copy by first-class mail with postage prepaid to each party named in the official service list.

Executed this 31st day of May, 2007 at San Francisco, California.

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Agnes Ng

CALIFORNIA PUBLIC UTILITIES COMMISSION

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